



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 25 2019

REPLY TO THE ATTENTION OF
WP-16J

Mr. Darin LeCrone, P.E.
Manager, Industrial Unit, Permit Section
Division of Water Pollution Control
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Re: Review of Public Notice Draft NPDES Permit for the JBS Swift Pork Company,
Beardstown, Illinois (IL0023914)

Dear Mr. LeCrone:

The U.S. Environmental Protection Agency has reviewed the Public Notice Draft NPDES Permit for the JBS Swift Pork Company, Beardstown, Illinois (IL0023914), which was received via United States Postal Service mail on August 21, 2019. Based on our review to date, EPA would not object to issuance of that permit. However, our position could change if any of the following occurs:

- a. Prior to the actual date of issuance of a Proposed Permit, an effluent guideline or standard is promulgated which is applicable to the permit and which would require revision or modification of a limitation or condition set forth in the Draft Permit;
- b. A variance is granted and the Permit is modified to incorporate the results of that variance;
- c. There are additional revisions to be incorporated into the Permit which have not been agreed to by EPA; or
- d. EPA learns of new information, including as the result of public comments, that causes EPA to reconsider its position.

Subject to the above conditions, the permit may be issued in accordance with the Memorandum of Agreement and pursuant to the Clean Water Act. Although we currently do not intend to object, EPA recommends you consider and address the comments identified in Enclosure A in

order to improve the overall permit.

When the Proposed permit is prepared, please forward a copy and any significant comments received during any public notice period to r5npdes@epa.gov. Please include the EPA permit number, the facility name, and the words "Proposed Permit" in the message title. If you have any technical questions related to EPA's review, please contact Jodie Opie at (312) 353-1938 or at opie.jodie@epa.gov.

Thank you for your cooperation during the review process and your thoughtful consideration of our comments.

Sincerely,



Andrea Schaller
Chief, Section 1, Permits Branch
Water Division

Enclosure

cc: Mark Liska, IEPA, electronically

Enclosure A

U.S. Environmental Protection Agency
Public Notice NPDES Permit Received August 21, 2019
JBS Swift Pork Company
Permit No. IL0023914

Please consider these comments to clarify and improve the fact sheet and permit:

Fact Sheet

1. On page 5 of the draft NPDES fact sheet in the very last sentence replace the word, "of" with the word, "than".

Permit

1. On page 3 of the Industrial NPDES Permit Review Notes regarding CBOD it states information regarding Excel Corporation. How does Excel Corporation fit into JBS Swift Pork Company? If this is an error, please correct it.
2. On page 4 of the Industrial NPDES Permit Review Notes the units of the second table are incorrect. The maximum daily and Maximum Monthly Avg. are not mg/l. It should be pounds per 1000 pounds.
3. The Beardstown STP NPDES permit (IL0025135) lists their receiving water as the Illinois River (40° 00' 50" N, 90° 26' 32" W) whereas the JBS Swift Pork NPDES permit list the receiving water as the Illinois River via the Beardstown STP effluent channel (40° 00' 48" N, 90° 26' 46" W). I just want to make sure that the receiving water is accurate between the two. Is there actually a Beardstown STP effluent channel (or for JBS should it also just be the Illinois River?) and if there is shouldn't the receiving water for Beardstown be listed as the Illinois River via the Beardstown STP effluent channel as well? Please clarify the receiving waters between the two NPDES permits in both the fact sheet and the draft NPDES permit.
4. On page 4 of the draft NPDES permit at SC 3 in paragraph A it states, "The discharge must not exceed the maximum limits in the following table during more than one percent of the hours in the 12-month period ending with any month." Please rewrite this sentence as it doesn't quite make sense.
5. On page 5 of the draft NPDES permit at SC 8 delete the phrase, "obvious levels." According to 302.203, Offensive Conditions, the receiving waters shall be free from offensive conditions such as floating debris, color, turbidity, etc.
6. The Development Document for the Meat and Poultry category discusses best management practices used for spray irrigation to reduce exposure to pathogens such as creating buffer zones with or without hedgerows, using low pressure nozzles aimed downward, avoiding wastewater spraying under windy conditions and restricting irrigation to daylight hours as well as requiring 6 months of storage to avoid spraying on frozen, snow-covered or saturated soils. These BMPs are not incorporated into the NPDES permit but are they incorporated into any other document/permit such as the operating permit for this facility? If not, it is recommended that these BMPs be

Enclosure A

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incorporated into the draft NPDES permit. And if they are located in the operating permit, please forward a copy of the operating permit to EPA.